

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

WISCONSIN ALUMNI RESEARCH
FOUNDATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 3:14-cv-00062-WMC

**JOINT MOTION REGARDING TIMING
FOR POST-TRIAL RESPONSE AND REPLY BRIEFS**

WHEREAS on November 20, 2015, Apple filed a Motion for Judgment As a Matter of Law or In The Alternative, for a New Trial (Dkt. 677);

WHEREAS WARF's brief responding to Dkt. 677 is due on December 11, 2015 and Apple's reply brief is due on December 21, 2015.

WHEREAS on November 23, 2015, WARF filed a Motion to Alter or Amend The Judgment Under Federal Rule of Civil Procedure 59(e) (Dkt. 681), a Motion for Equitable Relief (Dkt. 683), a Motion for An Accounting, Supplemental Damages Through the Date of Judgment, Pre-Judgment Interest, and Post-Judgment Interest (Dkt. 685), a Bill of Costs (Dkt. 688), and a Motion for Taxation of Costs (Dkt. 689);

WHEREAS on November 24, 2015 the Court set the deadline for Apple's briefs responding to Dkt. Nos. 681, 683, 685, 688, and 689 to December 11, 2015 and WARF's reply brief to December 21, 2015.

WHEREAS the parties believe that a slight modification to the briefing schedule can alleviate the burden on the parties and the Court during the upcoming holiday season.

NOW THEREFORE the parties jointly request the Court adjust the briefing schedule as follows:

1. Opposition briefs for Dkt. Nos. 677, 681, 683, 685, 688 and 689 will be due on December 21, 2015,
2. Reply briefs regarding the same motions will be due on January 11, 2016.

Dated: December 1, 2015

Respectfully submitted,

/s/ Gary Frischling

Morgan Chu
Gary Frischling
Jason Sheasby
Alan Heinrich
Christopher Abernethy
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067-4276
Telephone: (310) 277-1010
Facsimile: (310) 203-7199
MChu@irell.com; GFrischling@irell.com;
JSheasby@irell.com; AHeinrich@irell.com;
CAbernethy@irell.com

Jennifer L. Gregor
GODFREY & KAHN, S.C.
One East Main Street, Suite 500
Madison, WI 53703
Telephone: (608) 257-3911
Facsimile: (608) 257-0609
JGregor@gklaw.com

*Attorneys for Plaintiff
Wisconsin Alumni Research Foundation*

/s/ Derek A. Gosma

William F. Lee (*pro hac vice*)
Lauren B. Fletcher (*pro hac vice*)
Bryan S. Conley (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6000
william.lee@wilmerhale.com
lauren.fletcher@wilmerhale.com
bryan.conley@wilmerhale.com

David C. Marcus (*pro hac vice*)
Andrea W. Jeffries (*pro hac vice*)
Derek Gosma (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
350 South Grand Avenue, Suite 2100
Los Angeles, CA 90071
Tel: (213) 443-5300
david.marcus@wilmerhale.com
andrea.jeffries@wilmerhale.com
derek.gosma@wilmerhale.com

Mark D. Selwyn (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304

Tel: (650) 858-6000
mark.selwyn@wilmerhale.com

Catherine Cetrangolo
CETRA LAW FIRM LLC
20 North Carroll Street, 2d Floor
Madison, WI 53703
Tel: 608-535-9220
Email: cetrangolo@cetralaw.com

Attorneys for Defendant Apple Inc.